

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

REBECCA LYNNE COLBERT,)	C/A No. 4:21-cv-2034-JD
)	
Plaintiff,)	
v.)	
)	
HIGHLAND INDUSTRIES, INC.,)	
JOYSON KSS AUTO SAFETY, S.A.,)	
JOYSON SAFETY SYSTEMS f/k/a KEY)	Rule 26.01 Initial Disclosures
SAFETY SYSTEMS, HONDA MOTOR)	
CO., LTD., HONDA R&D CO., LTD.,)	
AMERICAN HONDA MOTOR CO., INC.,)	
AND HONDA DEVELOPMENT &)	
MANUFACTURING OF AMERICA, LLC)	
f/k/a HONDA OF AMERICA, MFG., INC.)	
)	
Defendants.)	

**DEFENDANT HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC'S
RULE 26.01 INITIAL DISCLOSURES**

Defendant Honda Development & Manufacturing of America, LLC f/k/a Honda of America, Mfg., Inc. ("HDMA") by and through its undersigned counsel makes the following initial disclosures pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina. AHM hereby responds to the Court's Interrogatories.

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE:

HDMA is not currently aware of any person or legal entity that has a subrogation interest in this claim, but upon information and belief, believes that it is possible that Plaintiff's insurance carriers (for her vehicle or medical insurance) may have a subrogation interest in this Action. Defendant HDMA reserves the right to supplement this response.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE:

This claim should be tried by a jury as pled by the Plaintiff in her Complaint. HDMA does not object to this request by Plaintiff.

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE:

HDMA is not a publicly-owned company.

- 1) **HDMA is a 100% owned subsidiary of Defendant American Honda Motor Co., Inc.**
- 2) **American Honda Motor Co., Inc is a 100% owned subsidiary of Defendant Honda Motor Co., Ltd., which is a publicly held corporation.**
- 3) **HDMA is not the parent of any publicly-owned company.**
- 4) **HDMA does not own more than 10% of any publicly owned company.**

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE:

As set forth in Defendant American Honda Motor Co, Inc.'s Motion to Dismiss for Improper Venue or in the alternative, Transfer Venue (ECF No.6) and Reply (ECF No. 14), HDMA objects to this Action being filed in the United States District Court for the District of South Carolina. HDMA will file a Motion to Join in AHM's Motion to Dismiss for Improper Venue or in the alternative, Transfer Venue. Defendant HDMA reserves the right to supplement this response.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical 24 transactions, happenings, or events; involve the identical

parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE:

HMDA is not aware of any other action, civil or criminal, that is related to this Action.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE:

HMDA is properly identified in this action and HMDA is not raising any objections to the summons and complaint issued to it.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE:

HMDA identifies the following non-party to this lawsuit as a person who may be liable in whole or in part to Plaintiff.

**Emerson Reed Trager
100 Raindrop
Wimberly, TX 78676**

Upon information and belief, Mr. Trager was driving the vehicle adverse to the vehicle operated by Plaintiff.

HMDA is conducting its investigation into the facts and circumstances identified in Plaintiff's Complaint and may have the right to seek indemnification (whether contractual or in tort) against other non-Honda defendants in this Action.

Defendant HDMA reserves the right to supplement this response.

(Signature Block on Following Page)

Respectfully submitted,

BOWMAN AND BROOKE, LLP

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American Honda Motor Company, Inc. and
Honda Development & Manufacturing of
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November 8, 2021

Columbia, South Carolina